

**UNITED STATES BANKRUPTCY COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	<b>§</b>	<b>BANKRUPTCY CASE NO.</b>
	<b>§</b>	
<b>VANTAGE TRAILERS, INC.</b>	<b>§</b>	<b>19-32244-H5-11</b>
	<b>§</b>	
<b>DEBTOR</b>	<b>§</b>	<b>Chapter 11</b>

**EMERGENCY MOTION FOR AUTHORITY TO USE CASH COLLATERAL**

**IF YOU WANT A HEARING, YOU MUST REQUEST ONE IN WRITING, AND YOU MUST RESPOND SPECIFICALLY TO EACH PARAGRAPH OF THIS PLEADING. YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY-ONE DAYS FROM THE DATE YOU WERE SERVED AND GIVE A COPY TO THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF.**

**IF A PARTY REQUESTS EMERGENCY CONSIDERATION, THE COURT MAY ACT EXPEDITIOUSLY ON THE MATTER. IF THE COURT ALLOWS A SHORTER RESPONSE TIME THAN TWENTY-ONE DAYS, YOU MUST RESPOND WITHIN THAT TIME. IF THE COURT SETS AN EMERGENCY HEARING BEFORE THE RESPONSE TIME WILL EXPIRE, ONLY ATTENDANCE AT THE HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS. IF AN EMERGENCY HEARING IS NOT SET, YOU MUST RESPOND BEFORE THE RESPONSE TIME EXPIRES.**

**EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

COMES NOW VANTAGE TRAILERS, INC., Debtor, and files this it's Emergency Motion for Authority to Use Cash Collateral, and in support thereof would respectfully state as follows:

1. Movant is the Debtor and Debtor in Possession herein.

2. Plains State Bank asserts a security interest in all of Debtor's accounts receivable by virtue of UCC filings to secure indebtedness owed by Debtor.
3. Debtor needs to continue its business herein in order to be able to propose a plan of reorganization.
4. Debtor has no alternative borrowing source and to remain in business must be permitted to use its funds collected from normal business operations to pay its pay payroll, rent, repairs and maintenance, insurance, utilities, office expenses and supplies.
5. This motion is an emergency motion under Bankruptcy Rule 4001(b)(2). Pending a final hearing on the relief requested by this motion, the Debtor needs to use the cash collateral to avoid immediate and irreparable harm to the estate in that absent such use the Debtor would be required to cease operations.
7. The cash collateral at issue herein is the accounts receivable. Attached as Exhibit "A" is a typical monthly budget that Debtor needs to have approved. Debtor consents to giving Plains State Bank a replacement lien on all of its security.

WHEREFORE, premises considered, Debtor respectfully moves this Honorable Court to authorize its use of cash collateral on an emergency basis and at a final hearing, and for such other and further relief as is just.

Respectfully submitted,

/s/ Margaret M. McClure  
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ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion was served on all parties in interest as set out on the attached matrix either electronically or by U.S. mail or fax on April 23, 2019.

/s/ Margaret M. McClure  
MARGARET M. MCCLURE

Cash	\$ -
Revenue	\$ 249,000.00
Accounts Receivable	\$ 80,000.00
<b>Total Revenue</b>	<b>\$ 329,000.00</b>

Fuel	\$ 1,000.00	
Cost of Goods sold	\$ 161,180.00	
shop supplies	\$ 1,500.00	
salary & payroll	\$ 104,000.00	
payroll taxes	\$ 62,000.00	
office supplies	\$ 1,250.00	
repairs and maint.	\$ 3,000.00	
accounting	\$ 2,500.00	
telephone & internet	\$ 3,800.00	
utilities	\$ 5,000.00	
insurance	\$ 21,000.00	
vehicles	\$ 3,000.00	
sales expense	\$ 2,500.00	
trash hauling, lawn, & maintenance	\$ 3,000.00	
petty cash	\$ 300.00	
postage	\$ 100.00	
	<b>\$ 375,130.00</b>	<b>\$ 329,000.00</b>

EXHIBIT "A"